



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

BLUE RIDGE REGIONAL OFFICE

901 Russell Drive, Salem, Virginia 24153

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www.deq.virginia.gov

Matthew J. Strickler
Secretary of Natural Resources

David K. Paylor
Director
(804) 698-4000

Robert J. Weld
Regional Director

November 17, 2020

Chad Bickford
General Manager
New Millennium Building Systems, LLC
100 Diuguids Lane
Salem, VA 24153

Location: Roanoke County
Registration No.: 20338

Dear Mr. Bickford:

Attached is a renewal Title V permit to operate your facility pursuant to 9VAC5 Chapter 80 Article 1 of the Virginia Regulations for the Control and Abatement of Air Pollution. The attached permit will be in effect beginning November 17, 2020.

In the course of evaluating the application and arriving at a final decision to issue this permit, the Department of Environmental Quality (DEQ) deemed the application complete on December 23, 2019 and solicited written public comments by placing a newspaper advertisement in *The Roanoke Times* on September 25, 2020. The thirty-day required comment period, provided for in 9VAC5-80-270, expired on October 26 2020.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and/or civil charges. Please read all permit conditions carefully.

To review any federal rules referenced in the attached permit, the US Government Publishing Office maintains text of these rules at www.cfr.gov, Title 40 Parts 60 and 63.

This permit approval to operate shall not relieve New Millennium Building Systems, LLC of the responsibility to comply with all other local, state, and federal permit regulations.

The Board's Regulations as contained in Title 9 of the Virginia Administrative Code 5-170-200 provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this case decision notice was mailed or delivered to you. Please consult the relevant regulations for additional requirements for such requests.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal of this decision by filing a Notice of Appeal with:

David K. Paylor, Director
Department of Environmental Quality
P. O. Box 1105
Richmond, VA 23218

If this permit was delivered to you by mail, three days are added to the thirty-day period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for information on the required content of the Notice of Appeal and for additional requirements governing appeals from decisions of administrative agencies.

If you have any questions concerning this permit, please contact the permit writer, Blake Apo at 540-598-0456 or blake.apo@deq.virginia.gov.

Sincerely,



Robert J. Weld
Regional Director

Attachment: Permit BRRO-20338

cc: Riley Burger, EPA Region III (burger.riley@epa.gov)
Eric McClees, New Millennium Building Systems, LLC (eric.mcclees@newmill.com)
Susan Tripp, DEQ Office of Air Permit Programs (OAPP) (susan.tripp@deq.virginia.gov)
Frank Craighead, DEQ BRRO Air Compliance Inspector (electronic)



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**Federal Operating Permit
Article 1**

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9VAC5-80-50 through 9VAC5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name: **New Millennium Building Systems, LLC**
Facility Name: **New Millennium Building Systems, LLC**
Facility Location: **2535 Diuguidds Lane, Salem, Virginia**
Registration Number: **20338**
Permit Number: **BRRO-20338**

This permit includes the following programs:
Federally Enforceable Requirements - Clean Air Act

November 17, 2020
Effective Date

November 16, 2025
Expiration Date



Robert J. Weld, Regional Director

11/17/2020
Signature Date

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Facility Information

Permittee

New Millennium Building Systems, LLC
7575 West Jefferson Blvd.
Fort Wayne, IN 46804

Responsible Official

Chad Bickford
General Manager

Facility

New Millennium Building Systems, LLC
2535 Diuguids Lane
Salem, VA 24153

Contact Person

Eric McClees
Environmental Manager
260-969-3548

County-Plant Identification Number: 51-161-00181

Facility Description: NAICS 332312 - Fabricated Structural Metal Manufacturing. This facility manufactures steel joists, girders, bridging and decking.

The facility is located in both Roanoke County and in the City of Salem, Virginia. The facility is a Title V major source of VOCs. The facility is a PSD synthetic minor source. Roanoke County has been designated by the U.S. Environmental Protection Agency (EPA) as "attainment" or "unclassified" for all criteria pollutants. However, the City of Salem and Roanoke County are designated as a VOC and NOx emission control area. Accordingly, DEQ Existing Source Rule 4-24 (Emission Standards For Solvent Metal Cleaning Operations Using Non-Halogenated Solvents; 9VAC5-40-3260) applies to the parts washers. The Decking Manufacturing (EU002) process is subject to NSPS Subpart TT (Standards of Performance for Metal Coil Surface Coating). The facility is an area source for HAPs and is subject to MACT Subpart XXXXXX (Standards for Hazardous Air Pollutant Area Source Standards for Nine Metal Fabrication and Finishing Source Categories).

The main process area is located at approximately 579.21 kilometers (km) East, 4,126.27 km North (Universal Transverse Mercator coordinates, Zone 17).

Emission Units

Process Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Document Date
EU001	None	<u>EU001 - Joist and Bridging Manufacturing, consists of:</u> Joist Line #1 - Rod/Crimp Line, Dip Tank (DT2)	285 lb/hr VOC	None	-	None	November 22, 2016
		Joist Line #2 - Long Span, Dip Tank (DT3)					
		Joist Line #3 - Specialty, Dip Tank (DT4)					
		Bridging Line Dip Paint Tank (DT5)					
		Joist and Bridging MIG Welding	470 lb/hr welding wire	None	-	None	
EU002	None	<u>EU002 - Decking Manufacturing, consists of:</u> Surface Prep Rollcoating (RC1) and two Paint Rollcoaters (RC2, RC3)	49 lb/hr VOC	None	-	None	November 22, 2016
EU003	None	Six parts washers using mineral spirits	1,000 gallons per year	None	-	None	-

*The Size/Rated capacity and PCD efficiency is provided for informational purposes only, and is not an applicable requirement.

Process Equipment Requirements - Joist and Bridging Manufacturing (EU001)

Limitations

1. **Process Equipment Requirements – (EU001) - Limitations** - VOC emissions from Joist and Bridging painting shall be controlled by process control by use of low VOC / high solids paint, or DEQ approved equivalent.
(9VAC5-80-110 and Condition 2 of the November 22, 2016 Permit Document)
2. **Process Equipment Requirements – (EU001) - Limitations** - VOC and Particulate emissions from Joist and Bridging painting shall be controlled by process control by using the dip coating process as the primary means for painting joists and bridging, or DEQ approved equivalent.
(9VAC5-80-110 and Condition 3 of the November 22, 2016 Permit Document)
3. **Process Equipment Requirements - (EU001) - Limitations** - VOC emissions from Joist and Bridging painting shall be controlled by the work practice of covering the opening at the top of the painting dip tanks during non-painting hours, or DEQ approved equivalent.
(9VAC5-80-110 and Condition 4 of the November 22, 2016 Permit Document)
4. **Process Equipment Requirements - (EU001) - Limitations** - Particulate emissions from Joist welding shall be controlled by process control by using the MIG welding process as the primary means for welding joists, or DEQ approved equivalent.
(9VAC5-80-110 and Condition 5 of the November 22, 2016 Permit Document)
5. **Process Equipment Requirements - (EU001) - Limitations** - The throughput of VOC in the Joist and Bridging painting system, thinners and clean up solvents, shall not exceed 223.4 tons per year, calculated monthly as the sum of each consecutive 12-month period.
(9VAC5-80-110 and Condition 16 of the November 22, 2016 Permit Document)
6. **Process Equipment Requirements - (EU001) - Limitations** - Emissions from the operation of the Joist and Bridging painting system, thinners and clean up solvents, shall not exceed the limits specified below:

Volatile Organic Compounds:

223.4 tons/yr

3.5 lbs/gal coating as applied

3.5 lbs/gal coating as applied, excluding water *

* applies only if water-based coatings are used

These emissions are derived from the estimated overall emission contribution from the Operating Limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in condition numbers 1, 2, 3 and 5.

(9VAC5-80-110 and Condition 21 of the November 22, 2016 Permit Document)

Testing and Recordkeeping

7. **Process Equipment Requirements - (EU001) - Testing** - The Joist and Bridging painting system dip tanks (DT2, DT3, DT4 & DT5) shall be tested at least monthly by EPA Method 24 to determine the VOC content per gallon of coating as applied in each dip tank when the process utilizes solvent-based paints. The permittee shall keep a record of all test results.
(9VAC5-80-110 and Condition 13 of the November 22, 2016 Permit Document)
8. **Process Equipment Requirements - (EU001) - Recordkeeping** - The VOC content of Water-based paints used in Joist and Bridging painting system shall be verified by formulation data supplied by the manufacturer of the coating. The permittee shall keep a record of all supplied data.
(9VAC5-80-110 and Condition 14 of the November 22, 2016 Permit Document)
9. **Process Equipment Requirements - (EU001) - Recordkeeping** - The permittee shall maintain records of emission data and operating parameters for Joist and Bridging (EU001) as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Air Compliance Manager, Blue Ridge Regional Office. These records shall include, but are not limited to:
 - a. Monthly throughput of tons of VOC used in the painting process calculated monthly; and annual throughput of tons of VOC, calculated monthly as the sum of each consecutive 12-month period.
 - b. Monthly throughput of gallons of coating calculated monthly.
 - c. Monthly pounds of VOC per gallon of coating as applied for each dip tank per Method 24, unless only compliant water-based coatings are used that month.
 - d. Daily records of pounds of VOC per gallon as applied excluding water and exempt solvents.
 - e. Annual throughput of welding wire (in thousands of pounds), calculated for each calendar year.
 - f. Annual throughput of tons of joists and bridging, calculated for each calendar year.
 - g. The permittee shall maintain the following information at all times:
 - i. Hours of operation per day and per year.
 - ii. Coating application system number
 - iii. Method of application
 - iv. Number and types of coats applied to the substrate
 - v. Drying method
 - vi. Substrate type
 - h. The permittee shall maintain the following information on a daily basis:
 - i. Coating application system number

- ii. Time period of each application run
 - iii. Coating identification number
 - iv. Amount of coating used.
 - v. Diluent and clean up solvent identification numbers
 - vi. Amount of diluent used.
 - vii. Amount of clean up solvents used.
 - viii. Calculated volatile organic compound emissions.
- i. The permittee shall maintain the following information for each coating at all times:
- i. Supplier name, coating name, and identification number
 - ii. Coating density (lb/gal)
 - iii. Volatile content of coating as supplied (percent by weight)
 - iv. Water content of coating as supplied (percent by weight)
 - v. Exempt solvent content of coating as supplied (percent by weight)
 - vi. Solids content of coating as supplied (percent by volume)
 - vii. Name of diluent added, if any
 - viii. Identification number of diluent
 - ix. Diluent VOC density (lbs/gal)
 - x. VOC content of diluent (percent by weight)
 - xi. Exempt solvent content of diluent (percent by weight)
 - xii. Diluent/coating ratio (gal diluent/gal coating)
- j. Material Safety Data Sheets (MSDS), Certified Product Data Sheets (CPDS), or other vendor information as approved by the DEQ showing VOC content, toxic compound content, HAP content, water content and solids content for each coating used.
- k. For each coating and solvent/reducer used in the Joist and Bridging coating application dip tanks, Material Safety Data Sheets (MSDS), Certified Product Data Sheets (CPDS), or other supplier information as approved by DEQ showing the VOC content (lb-VOC/gallon, excluding water).
- l. Operating procedures and operator training and as specified in condition number 35.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9VAC5-80-110 E and K and Condition 28 of the November 22, 2016 Permit Document)

Process Equipment Requirements - Decking Manufacturing (EU002)

Limitations

10. **Process Equipment Requirements - (EU002) - Limitations** - VOC emissions from Deck coating and painting shall be controlled by use of coatings which, as applied, do not exceed 2.33 pounds of VOC per gallon (0.28 kg/liter) of coating solids determined in accordance with Condition 13.
(9VAC5-80-110 and Condition 6 of the November 22, 2016 Permit Document)

11. **Process Equipment Requirements - (EU002) - Limitations** - VOC and Particulate emissions from Deck coating and painting shall be controlled by process control by using the roll coating process or DEQ approved equivalent.
(9VAC5-80-110 and Condition 7 of the November 22, 2016 Permit Document)
12. **Process Equipment Requirements - (EU002) - Limitations** - The throughput of VOC in the Decking Coating and Painting System, including material treatment, edge treatment, edge sealers, thinners and clean up substances, shall not exceed 22.1 tons per year, calculated monthly as the sum of each consecutive 12-month period.
(9VAC5-80-110 and Condition 17 of the November 22, 2016 Permit Document)
13. **Process Equipment Requirements - (EU002) - Limitations** - Emissions from the operation of the Decking Coating and Painting System, including material treatment, edge treatment, edge sealers, thinners and clean up substances, shall not exceed the limits specified below:

Volatile Organic Compounds:

22.1 tons/yr

2.33 lb/gal ** solids applied

** 0.28 kg/liter (NSPS Subpart TT)

These emissions are derived from the estimated overall emission contribution from the Operating Limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in condition numbers 10, 11 and 12.

(9VAC5-80-110, 40 CFR 60.462(a)(1) and Condition 22 of the November 22, 2016 Permit Document)

Monitoring and Recordkeeping

14. **Process Equipment Requirements - (EU002) - Monitoring and Recordkeeping** - Method 24, or data provided by the formulator of the coating, shall be used for determining the VOC content of each coating as applied to the surface of the decking. In the event of a dispute, Method 24 shall be the reference method. When VOC content of waterborne coatings, determined by Method 24, is used to determine compliance, the results of the Method 24 analysis shall be adjusted as described in Section 12.6 of Method 24. The permittee shall maintain at the source records of all data and calculations used to determine monthly VOC emissions.
(9VAC5-80-110, 40 CFR 60.465(e), 40 CFR 60.466(a)(1) and Condition 15 of the November 22, 2016 Permit Document)
15. **Process Equipment Requirements - (EU002) - Recordkeeping** - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Air Compliance Manager, Blue Ridge Regional Office. These records shall include, but are not limited to:
 - a. Monthly throughput of tons of VOC used in the decking painting process calculated monthly; and annual throughput of tons of VOC, calculated monthly as the sum of each consecutive 12-month period.

- b. Monthly throughput of gallons of decking coating calculated monthly.
- c. Monthly average pounds of VOC per gallon of solids as applied, calculated monthly, unless only compliant decking coatings are used that month, per NSPS Subpart TT.
- d. Annual throughput of tons of decking, calculated for each calendar year.
- e. The permittee shall maintain the following information at all times:
 - i. Hours of operation per day and per year.
 - ii. Coating application system number
 - iii. Method of application
 - iv. Number and types of coats applied to the substrate
 - v. Drying method
 - vi. Substrate type
- f. The permittee shall maintain the following information on a daily basis:
 - i. Coating application system number
 - ii. Time period of each application run
 - iii. Coating identification number
 - iv. Amount of coating used.
 - v. Diluent and clean up solvent identification numbers
 - vi. Amount of diluent used.
 - vii. Amount of clean up solvents used.
 - viii. Calculated volatile organic compound emissions.
- g. The permittee shall maintain the following information for each coating at all times:
 - i. Supplier name, coating name, and identification number
 - ii. Coating density (lb/gal)
 - iii. Volatile content of coating as supplied (percent by weight)
 - iv. Water content of coating as supplied (percent by weight)
 - v. Exempt solvent content of coating as supplied (percent by weight)
 - vi. Solids content of coating as supplied (percent by volume)
 - vii. Name of diluent added, if any
 - viii. Identification number of diluent
 - ix. Diluent VOC density (lbs/gal)
 - x. VOC content of diluent (percent by weight)
 - xi. Exempt solvent content of diluent (percent by weight)
 - xii. Diluent/coating ratio (gal diluent/gal coating)
- h. Material Safety Data Sheets (MSDS), Certified Product Data Sheets (CPDS), or other vendor information as approved by DEQ showing VOC content, toxic compound content, HAP content and solids content for each coating used.
- i. Operating procedures and operator training and as specified in condition number 35.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9VAC5-80-110 E and K, 40 CFR 60.464(a) and Condition 28 of the November 22, 2016 Permit Document)

Testing

16. **Process Equipment Requirements - (EU002) - Testing** - Monthly tests shall be conducted for determining monthly volume-weighted average emissions of VOCs in lb/gal of coating solids applied from the Decking coating and painting operation. If each individual coating used has a VOC content, as received, that is equal to or less than 0.28 kg/liter of coating solids, the affected facility is in compliance provided no VOC's are added to the coatings during distribution or application. Tests shall be conducted and reported in accordance with 40 CFR 60.463.
(9VAC5-80-110 E and K and 40 CFR 60.463)

Reporting

17. **Process Equipment Requirements - (EU002) - Reporting** - Following the initial performance test, the permittee shall identify, record and submit a written report to the Air Compliance Manager, Blue Ridge Regional Office every calendar quarter of each instance in which the volume-weighted average of the total mass of VOCs emitted to the atmosphere per volume of applied coating solids is greater than 2.33 lb/gal (0.28 kg/liter) of coating solids applied. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Air Compliance Manager, Blue Ridge Regional Office semiannually.
(9VAC5-80-110, 40 CFR 60.465 (c) and Condition 29 of the November 22, 2016 Permit Document)

MACT Subpart XXXXXX - Area Source Standards-Metal Fabrication and Finishing Source Categories (Joist and Bridging MIG Welding of EU001)

General Compliance Requirements

18. **MACT Subpart XXXXXX - Compliance Date Requirements** - The permittee shall achieve compliance with the applicable provisions of 40 CFR 63 Subpart XXXXXX by the compliance date specified in §63.11515 of this Subpart for existing fabricated structural metal manufacturing equipment.
(9VAC5-80-110 and 40 CFR 63.11515)
19. **MACT Subpart XXXXXX - General Requirements** - The permittee shall comply with the applicable portions of the general provisions of Subpart A as specified in §63.11522 and 63.11523 of 40 CFR 63 Subpart XXXXXX.
(9VAC5-80-110 and 40 CFR 63.11522 - 63.11523)

Standards and Management Practices

20. **MACT Subpart XXXXXX - Standards and Management Practices** - The permittee shall meet the applicable standards and management practices as specified in §63.11516 (f) Standards of welding of 40 CFR 63 Subpart XXXXXX.
(9VAC5-80-110 and 40 CFR 63.11516 (f))

Monitoring Requirements

21. **MACT Subpart XXXXXX - Monitoring** - The permittee shall comply with the applicable monitoring requirements as specified in §63.11517 of 40 CFR 63 Subpart XXXXXX.
(9VAC5-80-110 and 40 CFR 63.11517)

Notifications, Recordkeeping, and Reporting

22. **MACT Subpart XXXXXX - Notifications, Recordkeeping, and Reporting** - The permittee shall comply with the applicable notification, recordkeeping, and reporting requirements as specified in §63.11519 of 40 CFR 63 Subpart XXXXXX.
(9VAC5-80-110 and 40 CFR 63.11519)

Process Equipment Requirements - Solvent Degreasing Operations - Parts Washers (EU003)

Limitations

23. **Process Equipment Requirements – (EU003) - Limitations** - No owner or other person shall use or permit the use of any cold cleaner unless such cleaner is equipped with a control method that will remove, destroy or prevent the discharge into the atmosphere of at least 85% by weight of volatile organic compound emissions. Achievement of this emission standard by use of the methods in Conditions 24 through 27 will be acceptable to the board.
(9VAC5-80-110 and 9VAC5-40-3280 C)
24. **Process Equipment Requirements - (EU003) - Limitations** - VOC emissions from the degreaser shall be controlled as follows:
- Covers or enclosed remote reservoirs shall be provided. Covers shall be designed so that they can be easily operated with one hand. (Covers for larger degreasers may require mechanical assistance, by spring loading, counterweighting or powered systems). Enclosed remote reservoirs shall be designed such that they provide reduction effectiveness equivalent to that of a cover.
 - External or internal drainage facilities shall be provided to collect and return the solvent to a closed container or a solvent cleaning machine. The drainage facilities may be external for applications where an internal type cannot fit into the cleaning system.
 - A permanent label summarizing the operating method in Condition 25 shall be placed in a conspicuous location on or near the degreaser.

- d. If used, the solvent spray should be a solid, fluid stream (not a fine, atomized or shower type spray) and at a pressure which does not cause excessive splashing.

(9VAC5-80-110 and 9VAC5-40-3290 C1)

25. Process Equipment Requirements - (EU003) - Limitations - The permittee shall operate the degreasers consistent with good operating practices including the following:

- a. Waste solvent shall not be disposed of or transferred to another party, such that greater than 20% of the waste (by weight) can evaporate into the atmosphere. Waste solvent shall be stored in closed containers.
- b. The degreaser cover shall be closed whenever not handling parts in the cleaner.
- c. Cleaned parts shall be drained for at least 15 seconds or until dripping ceases.

(9VAC5-80-110 and 9VAC5-40-3290 C2)

26. Process Equipment Requirements - (EU003) - Limitations - The permittee shall dispose the waste solvent from solvent metal cleaning operations by one of the following methods:

- a. Reclamation (either services or in-house); or
- b. Incineration.

(9VAC5-80-110 and 9VAC5-40-3290 D)

Recordkeeping

27. Process Equipment Requirements - (EU003) - Recordkeeping - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Blue Ridge Regional Office. These records shall include, but are not limited to records documenting that each solvent cleaning operation (cold cleaning) at the facility is in compliance with the requirements of Conditions 23 through 26. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five years.

(9VAC5-80-110 E and K)

Facility Wide Conditions

Limitations

28. Facility Wide Conditions - Limitations - The combined throughput of VOC in Joist and Bridging Decking coating, and including all thinners and clean up solvents shall not exceed 245.5 tons per year, calculated monthly as the sum of each consecutive 12-month period.

(9VAC5-80-110 and Condition 18 of November 22, 2016 Permit Document)

29. **Facility Wide Conditions - Limitations** - The approved fuel for the facility is natural gas. A change in the fuel may require a permit to modify and operate.
(9VAC5-80-110 and Condition 19 of the November 22, 2016 Permit Document)
30. **Facility Wide Conditions - Limitations** - The combined emissions of VOC in Joist, Bridging and Decking forming and coating, including all thinners and clean up solvents shall not exceed the limits specified below:

Volatile Organic Compounds 245.5 tons/yr

These emissions are derived from the estimated overall emission contribution from the Operating Limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in condition numbers 1, 2, 3, 5, 10, 11 and 12.

(9VAC5-80-110 and Condition 23 of the November 22, 2016 Permit Document)

31. **Facility Wide Conditions - Limitations** - Fugitive dust emission controls shall include the following, or equivalent, as approved by DEQ:
- a. Use of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, grading of roads, or clearing of land.
 - b. Application of asphalt, water, or suitable chemicals on gravel roads, parking areas, storage areas, materials stockpiles, and other surfaces which may create airborne dust; paving of roadways, and maintenance of roadways in a clean condition.

(9VAC5-80-110 and Condition 11 of the November 22, 2016 Permit Document)

32. **Facility Wide Conditions - Limitations** - At all times the disposal of volatile organic compounds shall be accomplished by taking measures, to the extent practicable, consistent with air pollution control practices for minimizing emissions. Volatile organic compounds shall not be intentionally spilled, stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution practices for minimizing emissions.
(9VAC5-80-110 and Condition 12 of the November 22, 2016 Permit Document)

33. **Facility Wide Conditions - Limitations** - Except where this permit is more restrictive than the applicable requirement, the NSPS Subpart TT, Metal Coil Surface Coating, equipment as described in the Equipment List (EU002) shall be operated in compliance with the requirements of 40 CFR Part 60 Subpart TT.
(9VAC5-80-110 and Condition 20 of the November 22, 2016 Permit Document)

Recordkeeping

34. **Facility Wide Conditions - Recordkeeping** - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content

and format of such records shall be arranged with the Air Compliance Manager, Blue Ridge Regional Office. These records shall include, but are not limited to:

- a. Annual consumption of natural gas (in MMft³), calculated monthly as the sum of each consecutive 12 month period.
- b. Material Safety Data Sheets (MSDS), Certified Product Data Sheets (CPDS), or other vendor information as approved by DEQ showing VOC content, HAP content and solids content for each coating, thinner, and cleanup solvent used.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9VAC5-80-110 E and K and Condition 28 of the November 22, 2016 Permit document)

35. **Process Equipment Requirements - Recordkeeping** - The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment and process equipment which affect such emissions:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance of the air pollution control equipment and process equipment.
- b. Develop an inspection schedule, monthly at a minimum, to insure the operational integrity of the air pollution control equipment and process equipment, and maintain records of inspection results.
- c. Have available written operating procedures for the air pollution control equipment and process equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
- d. Train operators in the proper operation of air pollution control equipment and process equipment, and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.
- e. Maintain an inventory of spare parts that are needed to maintain the air pollution control equipment and process equipment in proper working order.

Records of maintenance, inspections and training shall be maintained on site for the most recent five (5) years and shall be made available to DEQ personnel upon request.

(9VAC5-80-110 E and K)

Testing

36. **Facility Wide Conditions - Testing** - The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.

(9VAC5-80-110)

37. **Facility Wide Conditions - Testing** - Upon request by the DEQ, the permittee shall conduct performance tests to demonstrate compliance with the emission limits contained in this permit. The details of the tests shall be arranged with the Air Compliance Manager, Blue Ridge Region. (9VAC5-80-110 and Condition 25 of the November 22, 2016 Permit document)
38. **Facility Wide Conditions - Testing** - If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ. (9VAC5-80-110)

Insignificant Emission Units

39. **Insignificant Emission Units** - The following emission units at the facility are identified in the application as insignificant emission units under 9VAC5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9VAC5-80-720B)	Rated Capacity (9VAC5-80-720C)
---	Pre-wash tank heater (Deck Line)	9VAC5-80-720C	---	3.5 MMBtu/hr ¹
---	Wash tank heater (Deck Line)	9VAC5-80-720C	---	3.5 MMBtu/hr ¹
---	Rinse tank heater (Deck Line)	9VAC5-80-720C	---	2.0 MMBtu/hr ¹
---	Two make-up air units for Joist Plant heat	9VAC5-80-720C	---	2.5 MMBtu/hr ¹ each
---	Two make-up air units for Deck Plant heat	9VAC5-80-720C	---	<2 MMBtu/hr ¹ each
---	Heating for office	9VAC5-80-720C	---	<2 MMBtu/hr ¹
--	Eight space heaters	9VAC5-80-720C	---	125,000 Btu/hr ¹ in aggregate
---	Water-based cutting fluid for roll forming lubricant and slitting operations	9VAC5-80-720B	VOC	---
---	Cutting fluid for sawing operations	9VAC5-80-720B	PM, VOC	---
---	Misc. spray paint (aerosol cans)	9VAC5-80-720B	PM, VOC	---
---	Plasma cutter (joist fabrication)	9VAC5-80-720B	PM, NOx, HAP metals	---
---	Plasma cutter (bridging fabrication)	9VAC5-80-720B	PM, NOx, HAP metals	---

¹ Natural Gas fuel

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9VAC5-80-110.

(9VAC5-80-110)

Permit Shield & Inapplicable Requirements

40. **Permit Shield & Inapplicable Requirements** - Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
40 CFR Part 64	Compliance Assurance Monitoring (CAM)	No add-on control equipment at the facility
Chapter 40 Article 30 – Rule 4-30	Emission Standards for Coil Coating Application Systems	Chapter 40 standards do not apply since the permit is at least as restrictive than Rule 4-30.
Chapter 40 Article 34 – Rule 4-34	Emission Standards for Miscellaneous Metal Parts and Products Coating Application Systems	Chapter 40 standards do not apply since the permit is at least as restrictive than Rule 4-34.

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by (i) the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.
(9VAC5-80-110 and 9VAC5-80-140)

General Conditions

41. **General Conditions - Federal Enforceability** - All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9VAC5-80-110)
42. **General Conditions - Permit Expiration**
- This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9VAC5-80-80, the right of the facility to operate shall be terminated upon permit expiration.
 - The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.

- c. If an applicant submits a timely and complete application for an initial permit or renewal under 9VAC5-80-80 F, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9VAC5 Chapter 80, until the Board takes final action on the application under 9VAC5-80-150.
- d. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9VAC5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9VAC5 Chapter 80.
- e. If an applicant submits a timely and complete application under section 9VAC5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9VAC5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
- f. The protection under subsections F 1 and F 5 (ii) of section 9VAC5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9VAC5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9VAC5-80-80, 9VAC5-80-110 and 9VAC5-80-170)

43. **General Conditions - Recordkeeping and Reporting** - All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
- a. The date, place as defined in the permit, and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.

(9VAC5-80-110)

44. **General Conditions - Recordkeeping and Reporting** - Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(9VAC5-80-110)

45. **General Conditions - Recordkeeping and Reporting** - The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than March 1 and September 1 of each calendar year. This report must be signed by a responsible official, consistent with 9VAC5-80-80 G, and shall include:
- a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31; and
 - b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:
 - i. Exceedances of emissions limitations or operational restrictions;
 - ii. Excursions from control device operating parameter requirements, as documented by continuous emission monitoring or periodic monitoring, or Compliance Assurance Monitoring (CAM) which indicates an exceedance of emission limitations or operational restrictions; or,
 - iii. Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
 - c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semiannual reporting period."

(9VAC5-80-110)

46. **General Conditions - Annual Compliance Certification** - Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices for the period ending December 31. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. The permittee shall maintain a copy of the certification for five (5) years after submittal of the certification. This certification shall be signed by a responsible official, consistent with 9VAC5-80-80 G, and shall include:
- a. The time period included in the certification. The time period to be addressed is January 1 to December 31;
 - b. The identification of each term or condition of the permit that is the basis of the certification;
 - c. The compliance status;

- d. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance;
- e. Consistent with subsection 9VAC5-80-110, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period;
- f. Such other facts as the permit may require to determine the compliance status of the source; and
- g. One copy of the annual compliance certification shall be submitted to EPA in electronic format only. The certification document should be sent to the following electronic mailing address:
R3_APD_Permits@epa.gov

(9VAC5-80-110)

- 47. **General Conditions - Permit Deviation Reporting** - The permittee shall notify the Blue Ridge Regional Office within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semiannual compliance monitoring report pursuant to Condition 45 of this permit.
(9VAC5-80-110 F. 2)
- 48. **General Conditions - Failure/Malfunction Reporting** - In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall no later than four daytime business hours after the malfunction is discovered, notify the Blue Ridge Regional Office such failure or malfunction and within 14 days provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Blue Ridge Regional Office.
(9VAC5-80-110 and 9VAC5-20-180)
- 49. **General Conditions - Severability** - The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9VAC5-80-110)
- 50. **General Conditions - Duty to Comply** - The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is ground for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.

(9VAC5-80-110)

51. **General Conditions - Need to Halt or Reduce Activity not a Defense** - It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
(9VAC5-80-110)
52. **General Conditions - Permit Modification** - A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9VAC5-80-50, 9VAC5-80-1100, 9VAC5-80-1605, or 9VAC5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.
(9VAC5-80-110, 9VAC5-80-190, and 9VAC5-80-260)
53. **General Conditions - Property Rights** - The permit does not convey any property rights of any sort, or any exclusive privilege.
(9VAC5-80-110)
54. **General Conditions - Duty to Submit Information** - The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.
(9VAC5-80-110)
55. **General Conditions - Duty to Submit Information** - Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9VAC5-80-80 G.
(9VAC5-80-110)
56. **General Conditions - Duty to Pay Permit Fees** - The owner of any source for which a permit was issued under 9VAC5-80-50 through 9VAC5-80-300 shall pay annual emissions fees, as applicable, consistent with the requirements of 9VAC5-80-310 through 9VAC5-80-350 and annual maintenance fees, as applicable, consistent with the requirements of 9VAC5-80-2310 through 9VAC5-80-2350.
(9VAC5-80-110, 9VAC5-80-310 et seq., and 9VAC5-80-2310 et seq.)
57. **General Conditions - Fugitive Dust Emission Standards** - During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:
 - a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;

- b. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
- c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or similar operations;
- d. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
- e. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9VAC5-80-110 and 9VAC5-50-50)

58. **General Conditions - Startup, Shutdown, and Malfunction** - At all times, including periods of startup, shutdown, and soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9VAC5-80-110 and 9VAC5-50-20 E)

59. **General Conditions - Alternative Operating Scenarios** - Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9VAC5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9VAC5 Chapter 80, Article 1.

(9VAC5-80-110)

60. **General Conditions - Inspection and Entry Requirements** - The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

- a. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
- b. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.

- d. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9VAC5-80-110)

61. **General Conditions - Reopening for Cause** - The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9VAC5-80-80 F. The conditions for reopening a permit are as follows:

- a. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- b. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- c. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9VAC5-80-110 D.

(9VAC5-80-110)

62. **General Conditions - Permit Availability** - Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.
(9VAC5-80-110 and 9VAC5-80-150)

63. **General Conditions - Transfer of Permits**

- a. No person shall transfer a permit from one location to another, unless authorized under 9VAC5-80-130, or from one piece of equipment to another.
- b. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9VAC5-80-200.
- c. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9VAC5-80-200.

(9VAC5-80-110 and 9VAC5-80-160)

64. **General Conditions - Permit Revocation or Termination for Cause** - A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9VAC5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any grounds for revocation or termination or for any other violations of these regulations.
(9VAC5-80-110, 9VAC5-80-190 C, and 9VAC5-80-260)
65. **General Conditions - Duty to Supplement or Correct Application** - Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9VAC5-80-110 and 9VAC5-80-80 E)
66. **General Conditions - Stratospheric Ozone Protection** - If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(9VAC5-80-110 and 40 CFR Part 82)
67. **General Conditions - Asbestos Requirements** - The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).
(9VAC5-60-70 and 9VAC5-80-110)
68. **General Conditions - Accidental Release Prevention** - If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.
(9VAC5-80-110 and 40 CFR Part 68)
69. **General Conditions - Changes to Permits for Emissions Trading** - No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
(9VAC5-80-110)
70. **General Conditions - Emissions Trading** - Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

- a. All terms and conditions required under 9VAC5-80-110, except subsection N, shall be included to determine compliance.
- b. The permit shield described in 9VAC5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
- c. The owner shall meet all applicable requirements including the requirements of 9VAC5-80-50 through 9VAC5-80-300.

(9VAC5-80-110)